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7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11

12 Plaintiff,

13 v.

14 RICHARD WHITTAKER,
15

16 Defendant.

Case No. 2:23-cr-00013-JCM-BNW

**STIPULATION TO EXTEND
DEADLINE TO PRODUCE
PROTECTIVE ORDER AND
RELEASE OF THE RAW TESTING
DATA**
(First Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Justin Washburn, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Jacquelyn N.
20 Witt, Assistant Federal Public Defender, counsel for Richard Whittaker, that the protective
21 order and release of the raw testing data deadline be extended seven (7) days, to and including
22 November 27, 2023.

23 The Stipulation is entered into for the following reasons:

24 1. On November 9, 2023, the Court ordered the defense to produce Dr. Jones-
25 Forrester's raw testing data to the government pursuant to a protective order. ECF No. 54.
26

1 2. The Court also ordered the parties meet and confer on the terms of the protective
2 order. *Id.*

3 3. On November 15, 2023, Assistant Federal Public Defender Jacquelyn N. Witt
4 and Assistant United States Attorney Justin Washburn conferred on the terms of the protective
5 order.

6 4. The parties are engaged in discussions regarding the terms of the protective order
7 and request a one-week continuance to determine whether the parties can reach an agreement
8 on the same.

9 This is the first stipulation to continue filed herein.

10 DATED this 20th day of November, 2023.

11 RENE L. VALLADARES
12 Federal Public Defender

JASON M. FRIERSON
United States Attorney

13 By /s/ Jacquelyn N. Witt


By /s/ Justin Washburn

14 JACQUELYN N. WITT
Assistant Federal Public Defender

JUSTIN WASHBURN
Assistant United States Attorney

UNITED STATES OF AMERICA,
Plaintiff,
v.
RICHARD WHITTAKER,
Defendant.

IT IS THEREFORE ORDERED that the protective order and release of the raw testing data deadline be extended seven (7) days, to and including November 27, 2023.


UNITED STATES MAGISTRATE JUDGE